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U.S. DISTRICT COURT  
SAN JUAN, PR

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

ADA MERCEDES CONDE VIDAL,  
et.als.

PLAINTIFFS,

v.

ALEJANDRO J. GARCIA PADILLA,  
et.als.

DEFENDANTS,

AND

Capellanes Internacionales  
Cristianos León de Judá, Inc.

PROPOSED INTERVENOR

NO. 3:14 cv-01253 (PG)

MOTION TO INTERVENE  
PURSUANT TO RULE 24(a)(2)

Proposed Intervenor-Defendant, “Capellanes Internacionales Cristianos León de Judá, Inc.”, (hereinafter “Proposed Intervenor “The Christian Chaplains”), a nonprofit corporation organized under the laws of the Commonwealth of Puerto Rico, represented by its’ President, Ms. Rosa Pérez, by and through its undersigned counsel, respectfully prays for leave to intervene pursuant to Rule 24(a)(2) of the Federal Rules of Civil Procedure, or alternatively, Rule 24(b) of the Federal Rules of Civil Procedure, and Rule 7 of the Local Rules of Practice and Procedure of the United States District Court for the District of Puerto Rico, files this Motion to Intervene of Right, or in the Alternative, for Permissive Intervention (“Motion”), as Intervenor-Defendant in this action. In support of this Motion, Proposed Intervenor “The Christian Chaplains” sets forth that:

- 1 This motion is timely and will not prejudice the interests of the other parties.
- 2 Proposed Intervenor “The Christian Chaplains” seeks to intervene as Intervenor-Defendant to oppose Plaintiffs and be conferred all of the rights of a party to participate fully in all aspects of the above-captioned case.
- 3 Intervention by Proposed Intervenor “The Christian Chaplains” in this matter is necessary because it has significant, distinct interests in this litigation and its ability to protect such interests may be impaired by the disposition of this case.
- 4 In support of this Motion, Proposed Intervenor “The Christian Chaplains” relies on the Declaration of Proposed Intervenor-Defendant’s representative, Ms. Rosa Perez, and Proposed Intervenor-Defendant’s Memorandum of Law filed contemporaneously herewith.

Respectfully submitted the 28th day of August, 2014.

By:

/s/



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#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 28, 2014, I will electronically file the foregoing document with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all attorneys in this case to their address of record.

By: /s/



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